

CHRIS T. RASMUSSEN, ESQ.
Nevada Bar No. 007149
RASMUSSEN LAW P.C.
520 South 4th Street
Las Vegas, Nevada 89101
(702) 384-5563
ctr@rasmussenlaw.com
Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.)
)
FERNANDO RAMIREZ, JR.,)
)
Defendant.)

Case No.: 2:19-cr-00300-JCM-EJY

**STIPULATION TO CONTINUE
SENTENCING**

IT IS HEREBY STIPULATED AND AGREED by and between defendant,
FERNANDO RAMIREZ JR., by and through his counsel, Chris T. Rasmussen, Esq., and the
United States America, by its counsel, Simon F. Kung, Assistant United States Attorney, that the
above-captioned matter currently scheduled for sentencing on May 5, 2021 at 10:00 a.m. be
vacated and continued for 90 days or for a time suitable to the court.

This Stipulation is entered into for the following reasons:

1. The parties agree to a continuance;
2. Counsel for Defendant needs additional time to adequately prepare for sentencing;
3. Defendant is not in custody. Counsel for the Defendant has spoken to the Defendant
and the Defendant has no objection to this continuance;
4. Denial of this request could result in a miscarriage of justice;
5. For all the above- stated reasons, the ends of justice would best be served by a
continuance of the sentencing date by 90 days.

1 6. This is the sixth request for continuance.

2 DATED this 28th day of April, 2021.

3
4
5 /s/ Chris T. Rasmussen

6 CHRIS T. RASMUSSEN, ESQ.
7 Attorney for Defendant

/s/ Simon F. Kung

SIMON F. KUNG
Assistant United States Attorney

CHRIS T. RASMUSSEN, ESQ.
Nevada Bar No. 007149
RASMUSSEN LAW P.C.
520 South 4th Street
Las Vegas, Nevada 89101
(702) 384-5563
ctr@rasmussenlaw.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	Case No.: 2:19-cr-00300-JCM-EJY
Plaintiff,)	
)	
vs.)	<u>FINDINGS OF FACT AND</u>
)	<u>CONCLUSIONS OF LAW</u>
)	
FERNANDO RAMIREZ, JR.,)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. The parties agree to a continuance;
2. Counsel for Defendant needs additional time to adequately prepare for sentencing;
3. Defendant is not in custody. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to this continuance.

CONCLUSIONS OF LAW

1. Denial of this request would result in a miscarriage of justice;
2. For all the above-stated reason, the ends of justice would best be served by a continuance of the sentencing date for 90 days.

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FERNANDO RAMIREZ, JR.,

Defendant.

ORDER

DATED April 30, 2021.

James C. Mahan
UNITED STATES DISTRICT JUDGE